

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION

MDL No. 2873

Master Docket No. 2:18-mn-2873-RMG

Judge Richard Mark Gergel

**Chubb Fire Limited's Response to  
Plaintiffs' Motion to Sever Claims  
Against Certain Defendants**

THIS DOCUMENT RELATES TO:

*Braun et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03370-RMG

*Gordon et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03371-RMG

*Smith et al v. 3M Company et al.*  
Case Number: 2:18-cv-03372-RMG

*Gutierrez et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03381-RMG

*Gokey et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03385-RMG

*Thompson et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03390-RMG

*Kahler et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03391-RMG

*Hutchison et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03395-RMG

*Helm et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03401-RMG

*Padilla et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03404-RMG

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*Niskern et al v. 3M Company, et al.*  
Case Number: 2:18-cv-03417-RMG

*Voelker, et al. v. 3M Company, et al.*  
Case Number: 2:18-cv-03438-RMG

*Donnelly v. 3M Company, et al.*  
Case Number: 2:20-cv-00209-RMG

*Bien v. 3M Company, et al.*  
Case Number: 2:20-cv-00257-RMG

*Sarvey v. 3M Company, et al.*  
Case Number: 2:20-cv-00278-RMG

*DeMaio v. 3M Company, et al.*  
Case Number: 2:20-cv-00291-RMG

*Field v. 3M Company, et al*  
Case Number: 2:20-cv-00301-RMG

*Hartman v. 3M Company, et al.*  
Case Number: 2:20-cv-00302-RMG

*Mola et al v. 3M Company, et al*  
Case Number: 2:20-cv-00428-RMG

*Feite v. 3M Company, et al.*  
Case Number: 2:20-cv-00521-RMG

*City of Watertown v. 3M Company, et al.*  
Case Number: 2:21-cv-01104-RMG

*Speers et al v. 3M Company, et al*  
Case Number: 2:21-cv-03181-RMG

*Southeast Morris County Municipal  
Utilities Authority, v. 3M Company, et al.*  
Case Number: 2:22-cv-00199-RMG

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Chubb Fire Limited hereby responds to Plaintiffs’ Motion to Sever [Doc. No. 4745] and proposed order [Doc. No. 4745-1]. Chubb Fire Limited is a defendant in the *City of Watertown* case (Case No. 2:21-cv-01104-RMG) and is one of the “Kidde-Related Entities” identified in

Plaintiffs' Motion to Sever. Although it is one of the Kidde-Related Entities identified in Plaintiffs' Motion, Chubb Fire Limited has separate counsel in this litigation from Kidde Fenwal, Inc., and the other Kidde-Related Entities.

Although Chubb Fire Limited does not oppose Plaintiffs' Motion to Sever, Plaintiffs' Counsel did not confer with Chubb Fire Limited's Counsel regarding the motion, and Chubb Fire Limited's counsel did not have an opportunity to review a draft of the motion or proposed order before they were filed.

Chubb Fire Limited files this response to make clear that it contests personal jurisdiction in this case, does not consent to the Court exercising jurisdiction over it, and reiterates its previous requests to be permitted to bring a motion contesting personal jurisdiction at the earliest opportunity.

Respectfully Submitted,

/s/ Richard P. Cassetta

A. Elizabeth Sternhell-Blackwell  
Stefani L. Wittenauer  
Richard P. Cassetta  
Bryan Cave Leighton Paisner LLP  
211 N. Broadway, Ste. 3600  
St. Louis, MO 63102  
(314) 259-2000  
[liz.blackwell@bclplaw.com](mailto:liz.blackwell@bclplaw.com)  
[stefani.wittenauer@bclplaw.com](mailto:stefani.wittenauer@bclplaw.com)  
[richard.cassetta@bclplaw.com](mailto:richard.cassetta@bclplaw.com)

Counsel for Defendant Chubb Fire, Ltd.

**CERTIFICATE OF SERVICE**

I, Richard P. Cassetta, an attorney and counsel of record for Defendant Chubb Fire Limited, hereby certify that on March 29, 2024, I caused a true and correct copy of the foregoing **CHUBB FIRE LIMITED'S RESPONSE TO PLAINTIFFS' MOTION TO SEVER CLAIMS AGAINST CERTAIN DEFENDANTS** to be served using the CM/ECF system on the Lead Counsel and Liaison Counsel of Record in the above-captioned action:

Michael A London  
DOUGLAS & LONDON PC  
59 Maiden Lane, 6<sup>th</sup> Floor  
New York, NY 10038  
P: (212)566-7500  
F: (212)566-7501  
Email: [mlondon@douglasandlondon.com](mailto:mlondon@douglasandlondon.com)

Joseph G. Petrosinelli  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
P: (202)434-5547  
F: (202)434-5029  
Email: [jpetrosinelli@wc.com](mailto:jpetrosinelli@wc.com)

Paul J. Napoli  
NAPOLI SHKOLINK PLLC  
1301 Avenue Of The Americas, 10<sup>th</sup> Floor  
New York, NY 10019  
P: (212)397-1000  
F: (646)843-7603  
Email: [pnapoli@napolilaw.com](mailto:pnapoli@napolilaw.com)

Michael A. Olsen  
MAYER BROWN LLP  
71 S. Wacker Dr.  
Chicago, IL 60606  
Email: [molsen@mayerbrown.com](mailto:molsen@mayerbrown.com)

Scott Summy  
BARON & BUDD, P.C.  
3102 Oak Lawn Ave., Suite 1100  
Dallas, TX 75219  
P: (214)521-3605  
Email: [ssummy@baronbudd.com](mailto:ssummy@baronbudd.com)

David E. Dukes  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
1320 Main Street, 17<sup>th</sup> Floor  
Columbia, SC 29201  
P: (803)255-9451  
F: (803)256-7500  
Email: [david.dukes@nelsonmullins.com](mailto:david.dukes@nelsonmullins.com)

Joseph Rice  
MOTLEY RICE LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
P: (843)216-9000  
F: (843)216-9440  
Email: [jrice@motleyrice.com](mailto:jrice@motleyrice.com)

Brian C. Duffy  
DUFFY & YOUNG LLC  
96 Broad Street  
Charleston, SC 29401  
Email: [bduffy@duffyandyoung.com](mailto:bduffy@duffyandyoung.com)

*Plaintiffs' Lead Counsel*

*Defendants' Lead Counsel*

/s/ Richard P. Cassetta

Richard P. Cassetta